UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

In Re: Pork Antitrust Litigation

Case No. 0:18-cv-01776-JRT-JFD

This Document Relates To:

All Commercial and Institutional Indirect Purchaser Plaintiffs Actions

JOINT MOTION REGARDING CONTINUED SEALING

Documents have been filed under temporary seal in connection with the following motion:

Defendants' Motion to Exclude the Testimony of Dr. Michael Williams

Doc. No. 1453

Pursuant to LR 5.6, the parties submit this Joint Motion Regarding Continued Sealing.

DKT. NO.	DKT. NO. OF REDACTED VERSION (IF FILED)	DESCRIPTION OF DOCUMENT	PRECISELY IDENTIFY: a) The information that the parties agree should remain sealed; b) The information the parties agree should be unsealed; and c) The information about which the parties disagree.	NONPARTY THAT DESIGNATED DOC. CONFIDENTIAL (IF ANY)	REASON WHY DOCUMENT SHOULD REMAIN SEALED OR BE UNSEALED ⁱ
1459	N/A	Memorandum in Support of Defendants' Motion to Exclude the Testimony of Dr. Michael Williams	Parties agree that the document should remain sealed, but a redacted copy should be filed with only minimal redactions. Those redactions are limited to (1) discussions of confidential data produced by a third party, and (2) quotes or descriptions of confidential documents.		Document should be unsealed except portions discussing confidential business information and methods of parties and third-parties.
1465- 01	N/A	Exhibit 1 to Thomson Declaration in Support of Defendants' Motion to Exclude the Testimony of Dr. Michael Williams	Parties agree that the document should remain sealed, but a redacted copy should be filed with only minimal redactions. Those redactions are limited to discussions of confidential data produced by a third party.		Exhibit consists of excerpts of deposition transcript which contains discussions of confidential data produced by a third party.
1465- 02	N/A	Exhibit 8 to Thomson Declaration in Support of Defendants' Motion to Exclude the Testimony of Dr. Michael Williams	Parties agree document should remain sealed.		Contains information regarding confidential business methods.
1465- 03	N/A	Exhibit 10 to Thomson Declaration in Support of Defendants' Motion to Exclude the Testimony of Dr. Michael Williams	Parties agree document should remain sealed.		Contained information regarding confidential business methods.

1729	N/A	Reply Memorandum in Support of Defendants' Motion to Exclude the Testimony of Dr. Michael Williams	Parties agree that the document should remain sealed, but a redacted copy should be filed with only minimal redactions limited to discussions of confidential data produced by a third party.	Document should be unsealed except portions discussing confidential business information of third-party.
1733	N/A	Exhibit 1 to Second Thomson Declaration in Support of Defendants' Motion to Exclude the Testimony of Dr. Michael Williams.	Parties agree document should be unsealed.	Exhibit consists of excerpts of deposition. Deposition transcript was designated confidential at time of filing but designation has been withdrawn as to excerpted portions.
1637	1638	Opposition to Motion to Exclude Expert Testimony of Dr. Michael Williams	The Parties agree that the redacted information should remain redacted.	Redacted portions of the document contain and/or discuss confidential business information and methods of parties and third-parties.

ⁱ This explanation should be very brief. For example:

- 1. contains information designated as confidential by a nonparty
- 2. contains information designated as confidential under a non-disclosure agreement between plaintiff and nonparty
- 3. discovery materials filed in connection with a motion under Fed R. Civ. P. 37
- 4. reveals trade secrets of defendant
- 5. reveals proprietary business methods of plaintiff
- 6. confidential financial records
- 7. confidential medical records
- 8. contains termination information regarding former employees of defendant
- 9. reveals information regarding a minor
- 10. contains information ordered sealed by the court on DATE [Docket No. XX]

Dated: February 10, 2023

Respectfully submitted,

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